

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

Qa Shontae Hosomla Short

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

v.

Enterprise Rental Car Sales

Avis Ford

La Fontaine

Mega MC car rental

Priceline

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case: 2:24-cv-10877

Judge: Steeh, George Caram

MJ: Patti, Anthony P.

Filed: 04-05-2024 At 01:53 PM

CMP SHORT v ENTERPRISE RENTAL CAR SALES,et al. (sk)

Jury Trial: ☐ Yes ☐ No
(check one)

Complaint for a Civil Case

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I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name GaShontae Hasomla Short
 Street Address 3576 Marketplace Circle
 City and County Rochester Hills ~~MI~~ 48369 Oakland
 State and Zip Code Michigan 48309
 Telephone Number (810) 597-5189
 E-mail Address courtcases79@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Enterprise Rental Car Sales
 Job or Title (if known) _____
 Street Address 7830 Convention blvd
 City and County ~~error~~ Macomb ~~error~~ Warren Macomb
 State and Zip Code Michigan 48092
 Telephone Number (586) 204-6598
 E-mail Address (if known) unk

Defendant No. 2

Avis Car Sales

Name Avis Ford dealership
 Job or Title (if known) Larry S.
 Street Address 29200 Telegraph rd.
 City and County Southfield Oakland
 State and Zip Code Michigan 48034
 Telephone Number (248) 430-7977
 E-mail Address (if known) N/A

6170 W Grand ave.
 suite 613 Gurnee, IL
 60031

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Defendant No. 3

Name LaFontaine Flushing

Job or Title _____
(if known)

Street Address 1510 E. Pierson rd.

City and County Flushing Genesee

State and Zip Code Michigan 48433

Telephone Number (810) 605-5068

E-mail Address f
(if known)

Defendant No. 4

Name Mega MC car rental

Job or Title _____
(if known)

Street Address 200 W. Woodlawn rd. Suite G

City and County ^{only} ~~Mecklenberg~~ Charlotte Mecklenberg

State and Zip Code North Carolina 28217

Telephone Number (980) 498-6947

E-mail Address booking@mega-mc.com
(if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

28:1330 Breach of contract

28:1331 Fed question

28:1331 et Fed question Anti trust

28:1331 2U Fed question Auto negligence

28:1331 bc Fed question Breach of contract

28:1331 pi Fed question
Personal injury

28:1331 Product liability

28:1331 Fed question
Tort Action

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Qashontae Hosomla Short,
is a citizen of the State of (name) Michigan.

28:1331 Fed question
violation 5th+6th Amend

b. If the plaintiff is a corporation

The plaintiff, (name) N/A,
is incorporated under the laws of the State of (name) N/A,
and has its principal place of business in the
State of (name) N/A.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of the
State of (name) _____. Or is a citizen of (foreign
nation) _____.

b. If the defendant is a corporation

The defendant, (name) Enterprise, is incorporated
under the laws of the State of (name) Missouri, and
has its principal place of business in the State of (name)
Michigan. Or is incorporated under the laws of
(foreign nation) _____, and has its principal place
of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

105 million

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

~~I rented a vehicle~~

2020 I was in a car accident in January 2020 where my black Toyota TC was hit by a male driver, white, late 50's early 60's who lived in Davison, Michigan. My passenger side rear tire was hit and it bent my tire inward making it almost undriveable.

I was working for Huntington bank in downtown Flint Michigan and catching the bus to work so I decided to rent a car for days it was cold and snowy and weekends to get away from home. I rented a car from Budget car rental at the Bishop International airport for 1 day. I needed to keep it longer so I requested an extension and it was granted. I liked the car and wanted to purchase so I looked up their car buying process. I kept in contact with the car rental agent to let them know my intent to purchase. I was approved to purchase but it was for a vehicle in Gurnee Illinois. I drove to Illinois but due to traffic I needed to extend because I did not make the dealership before they closed.

I went to return the vehicle back to Bishop International Airport asked for an extension but was refused so I made a reservation with a third party, Priceline, and returned the vehicle back to Bishop International Airport after refilling the gas tank. Then I was told I could keep the vehicle from Bishop International Airport so I cancelled the Priceline reservation and my money was taken and not returned. The car rental place must have been following me and so me park at work at Huntington Bank. I came out of work and the vehicle was gone. I attempted to pay Budget via my debit card but they declined because they wanted to charge my credit card but my limit wasn't high enough. So I did not pay.

When I was offered a job in North Carolina where I rented a vehicle from Mega MC Rental. I originally rented a Toyota Corolla then once I drove off the lot the police immediately followed me. Again I wanted or needed to rent the car for 1 day. I went to my interview then returned the vehicle. Paid for the rental then left. I returned back to rent another vehicle from Mega MC this time I needed it longer because I needed to go back to Michigan for my son who was hospitalized. I was continuously paying but needed to keep it longer. They threatened me and sent nasty emails so reported them and filed a lawsuit against the company. I was relocating to Charlotte NC to work for. Again the rental car agency must have been following me they started stealing items out of the vehicle so I would call the police. They disarmed the car so I had to have it towed to the Mazda dealership in Warren, MI and told the police I stole the vehicle. I relinquished the keys and the police took me to Enterprise where I purchased the 2018 Ford Focus. I complained of the car hesitating to go to the salesman during the test drive, he stated it was normal. I took the vehicle but noticed more and more problems. I called the dealership back because they had a 7 day buy back policy but they refused to take the vehicle back. I told the dealership it was a transmission issue, they still refused. I took the car to Avis Ford where the transmission issue was confirmed.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

My son was shot in his head
 I lost multiple jobs
 I was viciously stalked, harassed, followed, threatened and
 treated as a criminal that steals
 Then I was victimized
 I was forced in situations
 I lost personal property
 I was injured personally in multiple car accidents
 causing exacerbation of my Anxiety and PTSD.
 PRICELESS

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

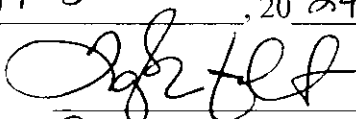
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: April 5, 2024.

Signature of Plaintiff

Printed Name of Plaintiff



QASHONTAE H SHORT

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Additional Information:

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

Genesee county, Oakland county

(c) Attorneys (Firm Name, Address, and Telephone Number)

Pro Se

DEFENDANTS

County of Residence of First Listed Defendant

Macomb

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

N/A

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES | |
|---|---|---|---|--|---|
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input checked="" type="checkbox"/> 190 Other Contract <input checked="" type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input checked="" type="checkbox"/> 350 Motor Vehicle <input checked="" type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice | <input checked="" type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes |
| REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education | PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | | | |

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☒ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

41 U.S.C. 7101(A) 41 U.S.C. 7108(a) 41 U.S.C. 7109(1)(2)(b)

Brief description of cause:

Dealership breached the contract and breached the warranty (repairs covered but not completed)

VII. REQUESTED IN COMPLAINT:

☒ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

105 mil
\$90,000 - \$200,000

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S)

IF ANY

(See instructions):

NO PENDING CASES

JUDGE

Premeditation car accident in Clio while in driver's my possession

Donetta Ambrose

DOCKET NUMBER

06-562

from LaFortune

DATE

I found

SIGNATURE OF ATTORNEY OF RECORD

CIVIL ACTION No. 06-562

FOR OFFICE USE ONLY

RECEIPT =

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☒ Yes
☐ No

If yes, give the following information:

Court: 67th Judicial District

Case No.: C 22G 3483-GC

Judge: Guinn, G. David

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☒ Yes
☐ No

If yes, give the following information:

Court: 7th Circuit

Case No.: 24 120634 N1

Judge: Bell, D. Celeste

Notes: Avis Ford has a complaint filed against them with Secretary of state
the FTC and BBB and MDCK support center.